



DEPARTMENT OF DEFENSE
REGIONAL ENVIRONMENTAL COORDINATOR, REGION 9
937 N. Harbor Drive, Box 81
San Diego, California 92132-0058

5090
Ser N40JRR.cs/0037
December 13, 2010

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

**SUBJECT: DOD COMMENTS REGARDING THE PROPOSED AMENDMENTS TO THE
IN-USE OFF-ROAD DIESEL RULE**

On behalf of the Department of Defense (DoD) Regional Environmental Coordinator in California, I write to express our support for the proposed changes to the In-Use Off-Road Diesel Rule.

As you may recall, we have testified before on the various compliance challenges that the rule, as currently written, presents to us. These challenges include federal laws and regulations governing military funding and procurement processes. For example, federal acquisition policies, which require a fair and open bidding process, could mean lead times of up to three or four years to acquire new equipment. Moreover, the dynamic nature of our military mission often requires DoD to reallocate and reprogram funding in a manner that is consistent with evolving national security objectives. Adoption of the proposed changes to the In-Use Off-Road Diesel Rule will facilitate our ability to comply with the regulation.

In closing, we are committed to compliance with state environmental regulations as well as all federal environmental, procurement, and fiscal laws. We thank you for the opportunity to participate in the rulemaking process.

Please direct any questions or concerns you may have regarding this submittal to my point of contact, Randal Friedman, at (619) 572-5037 or Ned McKinley, at (916) 930-5606.

Sincerely,

A handwritten signature in black ink, appearing to read "C.L. Stathos", is written over the word "Sincerely,".

C.L. STATHOS
By Direction